



Oregon

Theodore Kulongoski, Governor

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December 28, 2006

Mr. Robert J. Wyatt
Northwest Natural
220 N.W. Second Avenue
Portland, OR 97209

Also Sent Via E-mail

**Re: Addendum 2, Final Phase 1 Field Sampling Approach
Groundwater Source Evaluation
Northwest Natural Gas Company Site
Portland, Oregon
ECSI No. 84**

Dear Mr. Wyatt:

The Oregon Department of Environmental Quality (DEQ) reviewed the "Addendum to Offshore Final Phase I Field Sampling Approach, NW Natural, Gasco Site, Portland, Oregon" dated December 6, 2006. The December 6th addendum was supplemented by a letter dated December 20, 2006 that provided additional information and details regarding the location of Boring GS-06. The December 6th addendum and December 20th letter are collectively referred to as "Addendum 2" in this letter. Anchor Environmental, LLC prepared Addendum 2 on behalf of the Northwest Natural Gas Company (NWNG).

DEQ concurs with Anchor's determination that as proposed, Boring GS-06 is in a key location to provide data for the groundwater source control evaluation. DEQ approves Addendum 2 and its incorporation into the Phase 1 FSA¹ subject to the following conditions.

- NWNG will follow the procedures described in Addendum 2 to protect and repair the cap during and after drilling. Based on Figure 4, DEQ expects the organo-clay mat to be avoided. Although DEQ prefers the barge to be oriented so the spuds are not placed on the cap, DEQ acknowledges that avoiding the cap may not be practicable given access limitations and working space considerations. If the spuds must be placed on the cap, DEQ understands that after Boring GS-06 is abandoned, each spud location will be marked and then repaired with one cubic yard of similar armor stone, and the effectiveness of the repair(s) will be confirmed through inspection.
- Boring GS-06 is located in an area where significant contamination occurs. The current configuration of booms deployed during drilling includes (from inner-most to outer-most): 1) sorbent booms that encircle the 8-inch conductor casing; 2) sorbent booms that surround

¹ Anchor Environmental, LLC, 2006, "Final Phase 1 Field Sampling Approach, GASCO Siltronic Groundwater Source Evaluation", September (as amended by the "Addendum to Offshore Final Phase I Field Sampling Approach, NW Natural, Gasco Site, Portland, Oregon", September 29). A work plan prepared on behalf of the Northwest Natural Gas Company.

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the barge (including the spuds) and work area (i.e., area beneath the drilling platform); and 3) a containment boom that encloses the barge against the shore and prevents releases that could occur outside the sorbent boomed area, if any, from escaping to the river. Prior to initiating work at GS-06, this arrangement of sorbent/containment booms should be reviewed in anticipation of releases taking place from the spuds and borehole during drilling and when the spuds/conductor casing are retracted after drilling is complete.

- The inventory of available sorbent pads/booms should be checked prior to initiating work at GS-06 to ensure that sufficient quantities of each are available and ready for immediate use if needed.

Please don't hesitate to contact Dana Bayuk (503/229-5543) if you have any questions regarding this letter.

Sincerely,

Matt McClincy
Project Manager
Portland Harbor Section

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ECSI No. 84 File

